

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

MAR 25 2011



In the Matter of the Application of Grain Belt)
Express Clean Line LLC for a Limited)
Certificate of Public Convenience to Transact)
the Business of a Public Utility in the State)
of Kansas.)

Docket No. 11-GBEE-624-COC

PETITION TO INTERVENE

COMES NOW, ITC Great Plains, LLC (ITC Great Plains) and, pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, petitions the State Corporation Commission of the State of Kansas (Commission) for an order granting ITC Great Plains' intervention in the above-captioned matter. In support of its Petition, ITC Great Plains states as follows:

1. On March 7, 2011, Green Belt Express Clean Line LLC (Clean Line) filed its application for a limited certificate of public convenience and necessity to site, construct, own, operate and maintain bulk electric transmission facilities located in the State of Kansas. Clean Line indicated it seeks a certificate for "Transmission Rights Only." Application at 1.

2. Clean Line stated its mission is to "construct and operate high voltage transmission lines and associated facilities for the purpose of connecting the best renewable resources in the U.S. with load and population centers that have an increasing demand for electricity generated by renewable resources." *Id.* at 2. Clean Line indicated it currently has several high voltage transmission line projects under development. *Id.*

3. One of Clean Line's projects is "a ±500 or ±600 kilovolt ("kV"), high voltage direct current ("HVDC") transmission line and associated facilities that will be capable of delivering 3,500 megawatts ("MW") of power from Kansas to load centers farther east. The transmission line will originate in western Kansas near Sunflower's Spearville substation, will

traverse east across the state into Missouri, and as currently planned, will interconnect with the AC grid at the St. Francois substation in southeastern Missouri.” *Id.* at 2-3. Called the Grain Belt Express, the line will be approximately 550 miles in length and will deliver renewable energy to the Midwest ISO market. *Id.* at 3.

4. As a Transmission Owner in the Southwest Power Pool, Inc. (SPP), ITC Great Plains has a vested interest in ensuring that all transmission facilities are planned and coordinated in a consistent and reliable manner to ensure the continued reliability of the transmission grid, especially for those assets we currently or plan to own and operate in the State of Kansas. Further, ITC Great Plains has an interest in ensuring that all new transmission entities are treated fairly and in accordance with order granting ITC Great Plains its initial certificate in Docket No. 07-ITCE-380-COC. This will provide a level playing field and ensure that transmission is built according to SPP planning practices.

5. As an independent transmission company certificated in the State of Kansas, ITC Great Plains may or will be affected by any Commission order or activity in this proceeding. K.A.R. 82-1-225(a)(2). Further, ITC Great Plains’ legal interests are not adequately represented by any existing party. Finally, the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing ITC Great Plains to intervene. K.A.R. 82-1-225(a)(3).

6. In addition to undersigned counsel, copies of all pleadings, notices, orders and other documents should be mailed to the following individuals:

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7. For the above and foregoing reasons, ITC Great Plains should be permitted to intervene and represent its unique interests fully before the Commission in this proceeding.

WHEREFORE, ITC Great Plains respectfully requests that the Commission grants its Petition to Intervene in this docket and for such further relief the Commission deems necessary and appropriate.

Respectfully submitted,




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ATTORNEYS FOR ITC GREAT PLAINS, LLC

VERIFICATION

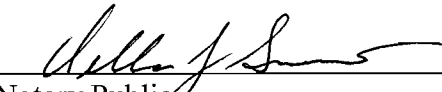
STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

Susan B. Cunningham, being of lawful age and duly sworn, states that she has caused the foregoing Petition to Intervene to be prepared, that she has read and reviewed the Petition, and that the contents thereof are true and correct to the best of her knowledge and belief.



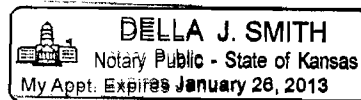
Susan B. Cunningham

Sworn to and subscribed before me this 25th day of March, 2011.



Notary Public

My commission expires: *1/26/2013*



CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was served via U.S. Mail or hand-delivered on this 25th day of March, 2011 as indicated to the following persons:

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